IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

JANE DOE and JOHN ROE, :

Plaintiffs, :

No. 3:23-cv-1747

v.

JURY TRIAL DEMANDED

TEACHERS COUNCIL, INC.

Defendant.

MOTION FOR ADMISSION PRO HAC VICE

NOW COME Joel A. Ready, Esq. and Cornerstone Law Firm, representing Teachers Council in the above-captioned matter, and move this Honorable Court to enter an order granting admission *pro hac vice* specific to this particular case.

- 1. Movant Joel A. Ready, Esq. is a member of the bar of the Supreme Court of Pennsylvania and of multiple United States District Courts, including the Eastern, Middle, and Western Districts of Pennsylvania.
- 2. Attorney Ready and Cornerstone Law Firm have represented Teachers Council through the course of administrative proceedings that led to the present lawsuit. Teachers Council desires to continue the undersigned's representation in the matter brought before this Court.
- 3. Movants will actively associate with a member of the bar of this District, who will participate meaningfully in the defense of this action.
- 4. Movants have registered for filing privileges in this District through the PACER system.
- 5. Movants certify they maintain professional liability insurance equivalent to that required by the Bar of this Court and will maintain that coverage in full force and effect throughout the duration of the present matter.

WHEREFORE, Movants Joel A. Ready, Esquire, and Cornerstone Law Firm respectfully request this Honorable Court to enter an Order granting a special appearance *pro hac vice* on behalf of the Defendant in the above-captioned case.

Respectfully Submitted,

Date: December 8, 2023

Joel A. Ready, Esq. P.A. Attorney I.D. # 321966

Co-counsel for Defendant